



FEDERAL ELECTION COMMISSION

WASHINGTON, D C 20463

SEP 1 2005

James T. Cowdery, Esq.
Cowdery, Ecker & Murphy, LLC
750 Main Street
Hartford, Connecticut 06103-2703

RE: MUR 5453
James S. Paolino

Dear Mr. Cowdery:

On May 18, 2004, the Federal Election Commission found reason to believe that your client, former treasurer James S. Paolino, violated 2 U.S.C. §§ 441b(a) and 441a(f) in his personal capacity. On August 29, 2005, the Commission determined to take no further action with respect to Mr. Paolino in connection with 2 U.S.C. § 441b(a). At your request, the Commission also determined to enter into negotiations directed towards reaching a conciliation agreement in connection with 2 U.S.C. §§ 441a(f), 434(a)(1) and (b)(2) in settlement of this matter prior to a finding of probable cause to believe.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If your client agrees with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible.

If you have any questions or suggestions for changes in the agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact me at (202) 694-1650.

Sincerely,

Christine C. Gallagher

Christine C. Gallagher
Attorney

Enclosure
Conciliation Agreement

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